



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JACQUELYN A. DAINOW  
Phone: (212) 356-0896  
Fax: (212) 356-1148  
[jadainow@law.nyc.gov](mailto:jadainow@law.nyc.gov)  
(not for service)

November 15, 2023

**BY ECF**

Honorable Arun Subramanian  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

Re: *Rodriguez v. City of New York, et al.*, No. 21-CV-8565 (AS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for the City of New York in the above-referenced matter. I write jointly with all parties to respectfully request a brief one-week extension of the parties' summary judgment motion briefing schedule.

Pursuant to Your Honor's October 25, 2023 Order, motions for summary judgment are due by November 20, 2023, opposition briefs are due by December 11, 2023, and reply briefs are due by December 18, 2023. On behalf of the City, I am requesting an extension as I have been sick, which has hampered my ability to devote the time necessary to this motion. Plaintiff's counsel is also requesting an extension as he has been extremely backed up after trial and has been dealing with a lot of briefing in another case. While State Defendants do not have a position regarding the need for the extension, they join in this request only to make the motion schedule consistent for all parties.

In light of the foregoing, and taking into account the upcoming holidays, the parties propose the following amended briefing schedule: motions for summary judgment are due by November 27, 2023, opposition briefs are due by December 18, 2023, and reply briefs are due by December 27, 2023.

This is the parties' first request for an extension of the briefing schedule deadlines.

The parties thank Your Honor for time and your consideration in this matter.

Respectfully,

/s/ Jacquelyn Dainow  
Jacquelyn Dainow  
Assistant Corporation Counsel

cc: BY ECF  
All counsel of record